

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,

Plaintiff,

v.

MOSHE HANANEL,

Defendant.

**Civil Action No. 04-cv-10357-RCL
(Sorokin, U.S.M.J.)**

ECF Case

PLAINTIFF'S MOTION FOR PROTECTIVE ORDER

Plaintiff moves, pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule 37.1, for a protective order against Defendant Moshe Hananel's Notice of Deposition of Sheldon G. Adelson. The reasons are set forth in the accompanying Memorandum of Law.

WHEREFORE, the Court should grant a protective order providing that Sheldon G. Adelson need not appear for deposition on August 15, 2008.

August 14, 2008

Respectfully submitted,

/s/ Andrew H. Schapiro

MAYER BROWN LLP

Andrew H. Schapiro

Christopher J. Houpt

1675 Broadway

New York, New York 10019

(212) 506-2500

Attorneys for Plaintiff

Sheldon G. Adelson

LOCAL RULES 7.1 AND 37.1 CERTIFICATION

The undersigned hereby confirms that the conferences required by Local Rules 7.1(A)(2) and 37.1(a) occurred by telephone between plaintiff's counsel and Lawrence G. Green on August 14, 2008, without agreement.

/s/ Andrew H. Schapiro

Andrew H. Schapiro

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Andrew H. Schapiro

Andrew H. Schapiro